

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DONALD H. GARDNER, p/k/a  
BLACKA NICE,

Plaintiff,

vs.

RAMON LUIS AYALA-RODRIGUEZ,  
p/k/a DADDY YANKEE, EL CARTEL  
RECORDS, INC., LOS CANGRIS  
PUBLISHING, MACHETE MUSIC,  
UNIVERSAL MUSIC DISTRIBUTION  
CORP., UNIVERSAL MUSIC GROUP,  
VIDAL INVESTMENT, INC., and  
VI MUSIC, INC.

Defendants.

Case No. 07-cv-6535-RJS

**NOTICE OF MOTION FOR  
SUBSTITUTED SERVICE**

**AFFIDAVIT OF  
ANDREW HEGT**

I, Andrew Hegt, Esquire, according to law, upon his oath, deposes and says:

1. I am an associate of Burrell, Regenstreich, LLC., the attorneys for Plaintiff DONALD H. GARDNER, p/k/a BLACKA NICE ("Plaintiff") in this matter.
2. I have had numerous conversations with the representatives of "Fugitive Investigations" in Puerto Rico. I have been in constant contact with Betsy Alvarez, a principal of the investigation firm as well as "Michael", who I also believe to be a principal of the investigation firm. "Michael" is a retired police officer in Puerto Rico and he has been responsible for the investigation and service of the within Complaint. "Michael" is aware of Defendant AYALA as well as his attorney Edwin Prado, Esq. He contacted Edwin Prado, Esq. as they have had numerous prior dealings. "Michael" has advised that Mr. Prado refused to provide any information regarding Defendant AYALA.

3. I remain in close contact with the principals and representatives of "Fugitive Investigations" and they are continuing their attempts to effectuate personal service upon Defendant AYALA.

By:   
Andrew Hegt  
BURRELL, REGENSTREICH, LLC  
*Attorneys for Plaintiff*